

FILED

OCT 25 2007

**NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT**

October 3, 2007

Timothy Dimitri Brown

10979-035 Unit F-1

United States Penitentiary

P.O. Box 24550

Tucson, AZ 85734

United States District Court

District of Columbia

Timothy Dimitri Brown

Civil No. _____

vs

5 USC 552

Federal Bureau of Investigations

Freedom of

Department of Justice

Information Act

United States Attorney's Office

United States Attorney General's Office

Bureau of Prisons

Case: 1:07-cv-01931

Assigned To : Roberts, Richard W.

Assign. Date : 10/25/2007

Description: FOIA/Privacy Act

_____/

COMPLAINT

Complainant, Timothy Dimitri Brown, now comes before this court and complains that he has been unlawfully denied access to information, documents and/or otherwise entitled to him under the Freedom of Information Act. This unlawful denial of this information, documents and/or otherwise is causing complainant the harm of being unlawfully incarcerated.

JURISDICTION

This Court has jurisdiction under the Freedom of Information Act, 5 USC § 552 et. al., Federal Question

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Jurisdiction, 28 USC § 1331. Defendants are agents/agencies of the United States.

CAUSE OF ACTION

Defendants have and continue to willfully and knowingly deny complainant access to information contain in their respective organizations files and/or in related organizations files which the complainant has statutory right to under the Freedom of Information Act, whereas this information shows conclusively that complainant is innocent of the charges for which he is currently incarcerated.

FACTS

Complainant has requested any and all information, documents and/or otherwise related, referring and/or otherwise him that agencies have in their files. Specifically complainant seeks: (1) tapes, audio and video, of the FBI'S informant (Chadwick McNeal) and complainant conversation outside of the complainant's business located at 3708 3rd Street, Alexandria, Louisiana, where complainant tried to get informant to stop selling drugs. FBI Agent Ken Klocke testified to the existence of the tapes, both audio and video, yet continues to refuse complainant access to them. (2) Reports of interrogation of Lynetta Johnson by Agent Scholarman. (3) Reports of interrogation of Joyce Berry and Joyce Green. (4) Any and all other information, documents and/or otherwise of the exculpatory nature concerning complainant, operation Disturb the Peace. (5) Reports from the Attorney General's Office as to whether the federal government exercised exclusive legislative jurisdiction over property located at 3708 Third Street, Alexandria, Louisiana on or before May 31,

2001. 28 CFR Ch 1 § 0.56 Subpart K., Public Law 97-96, § 6, 95 Stat. 1210. (6) Reports from the FBI and Bureau of Prisons concerning Agent Brewer and Unknown White Female's interrogation of Complainant on 10-17-06 concerning the thief of complainant's book, "Tyrant Wanted" by Bureau of Prisons' employee FNU LaRocca. (7) Reports from the Attorney General's Office on the legal status of Title 21 USC § 841 and 846, Public Law 91-513, Section 801 and 802, whereas these "Provisions" under H.R. 18583 were never properly enacted into federal criminal law by the Congress.

Complainant has properly requested this information from the agents/agencies, properly appealed their denial of the information and now properly files this suit for said information.

DAMAGE TO COMPLAINANT

The actual, physical, emotional, mental, business, reputational and family damages associated with being unlawfully kidnapped and falsely imprisoned.

PRAYER FOR RELIEF

Complainant prays this Honorable Court issues orders to each agency to immediately disclose any and all materials in their possession and/or possession of relative agency concerning complainant, operation Disturb the Peace, to produce Vaughn index. Complainant further prays for injunctive relief from Bureau of Prisons, its employee, agency(s) or otherwise to discontinue the thief of complainant's property and for the immediate return of complainant's property, book "Tyrant Wanted." Complainant request he be granted any and all relief to which he maybe entitled, including but not limited

to actual and punitive damages, legal cost and any other relief the court deems appropriate.

Graciously Submitted,


Timothy Dimitri Brown

CERTIFICATION

I, Timothy Dimitri Brown, hereby certify that all the above is true to the best of my knowledge. That I have mailed a true and complete copy of the foregoing to:

U.S. Attorney's Office	U.S. Attorney General
301 Fannin Street, #3201	950 Pennsylvania Ave.
Shreveport, La. 71101	Washington, DC 20530
Federal Bureau of Investigation	Bureau of Prisons
2901 Leon C. Simon Blvd.	4211 Cedar Springs
New Orleans, La. 70126	Dallas, Texas 75219

Service on the United States through the United States Attorney General's Office.